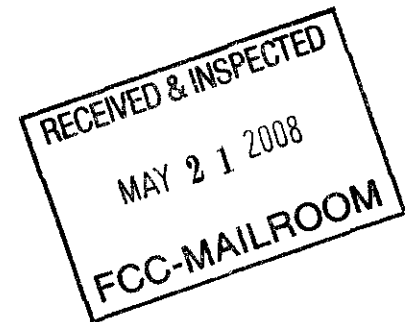


Pine Street Church of God

1303 Leader Street
Douglas, GA 31533
(912) 384-0584 phone
(912) 384-1740 fax

May 16, 2008

Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554



PETITION FOR EXEMPTION FROM CLOSED CAPTIONING REQUIREMENTS

The Pine Street Church of God is a religious non-profit institution located in Douglas, GA (population 25,000) under the guidelines of the General Assembly of the Church of God Headquarters in Cleveland, TN. The church was established in 1983 under the leadership of the late Bishop Alphonso Johnson. The Pine Street Church of God with its present membership of approximately 300 members, is currently under the leadership of Pastor Betty J. Johnson; who is now serving in her 8th year.

The mission of the church is to communicate the full gospel of Jesus Christ to the lost and to empower believers in the Spirit and power of Pentecost.

"Higher Dimensions Through Praise and Worship" is a 30 minute spiritual program that airs once a week on WFXL Fox 31, Sundays at 7:30 a.m. The program is produced in house by numerous volunteers in the technical and musical ministries. The demographics of the program are anyone who watches the broadcast and wants to experience the life changing power of Jesus Christ.

For the reasons set forth below, the Pine Street Church of God hereby requests an undue burden exemption from the closed captioning rules for "Higher Dimensions Through Praise and Worship". pursuant to Section 79.1 (f) of the commission's rules.

NATURE AND COST OF CLOSED CAPTIONS (see attached)

In addition to local production cost of approximately \$260.00 a month, our monthly broadcasting cost is \$1,000 per month to WFXL Fox 31. Captioning would cost an additional \$940 per month. The context of the broadcast consists of a preached sermon that is unscripted. No text is available.

The cost of captioning would cost just as much per month as the airing of the broadcast. We would be unable to make this broadcast possible. This additional cost would also severely limit our ability to provide for the needs of our local body.

FINANCIAL RESOURCES OF THE PROGRAM PROVIDER

The Pine Street Church of God is a religious institution, consisting of church services and benevolence ministries. We are doing this entry level and trusting for an increase.

OTHER FACTORS

It is on only one station and is a non news broadcast. Petitioner believes that the local, non-news exemption to the closed captioning rules also applies to "Higher Dimensions Through Praise and Worship". As noted above, the program is produced and distributed locally, and the sermons of the Pine Street Church of God are primarily of local public interest. The episodes are not news, they do not have repeat value, and the electronic newsroom technique is not available. Notwithstanding the applicability of the exemption, we have filed this petition in abundance of caution and for the purpose of establishing certainty.

CONCLUSION


As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would create an undue burden. The cost of captioning would be excessively high and would have a significant impact on Petitioner's operations. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream programming provider. Because of the significant difficulty and expense of providing closed captions, a waiver under Section 79.1 (f) is warranted. If more information is needed, please contact me at the address provided below.

This exemption is self-implementing, and therefore Petitioner notes its applicability without expecting or requesting FCC action on it.

Respectfully submitted,

Pine Street Church of God

By:


Craig Johnson, Church Administrator

1303 Leader Street

Douglas, GA 31533

912-384-0584 phone

912-384-1740 fax

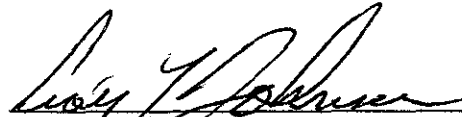
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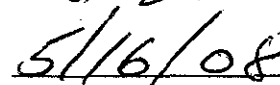
May 16, 2008

Letter of Affirmation

I, Craig Johnson, am church administrator of the Pine Street Church of God, and I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of the Pine Street Church of God in this matter, and, upon information and belief, believe the statements regarding our organization and "Higher Dimensions Through Praise and Worship" to be true and accurate.



Craig Johnson, Church Administrator



Date

Pine Street Church of God

1303 Leader Street
Douglas, GA 31533
(912) 384-0584 phone
(912) 384-1740 fax

May 16, 2008

Schedule of Programming:

Pine Street Church of God produces only one program "Higher Dimension Through Praise and Worship" and it airs on the Fox affiliate WFXL-UHF31 on Sundays @ 7:30 a.m.

Craig Johnson - Pine Street Church of God

Pine Street Church of God

Income and Expense Statement January 2007 - August 2007

Income

GENERAL FUND REVENUE	\$140,033.46
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EXPENSES

Building	\$39,777.48
Utilities	\$12,602.71
Outreach	\$10,418.75
Vehicles	\$13,713.04
Youth Department	\$10,513.03
Ministry Expense	\$15,314.33
Music	\$11,127.13
Recreation	\$10,000.00
Contributions	\$22,450.00
Miscellaneous	\$9,827.59
TOTAL EXPENSES	\$141,944.06
EXCESS INCOME/EXPENSES	-\$1,910.60

From: Justin K. Macedonia [mailto:jkmacedonia@vicaps.com]
Sent: Monday, June 04, 2007 10:37 AM
To: pcoffman@wfxl.com
Subject: - Closed Captioning Quote

Pat,

It was a pleasure speaking with you.

As discussed, our price to close caption the 30-minute program we discussed would be \$235. This price includes transcription, Basic Roll-up style captions, encoding to DVCPRO, tape stock, and a three business day turnaround. Faster turnarounds (including same day) are available at additional charge.

If you have any questions, please don't hesitate to contact me.

Thanks,
Justin

Justin K. Macedonia
Video Caption Corporation
800-705-1203 (phone)
845-868-1188 (fax)
jkmacedonia@vicaps.com
www.vicaps.com